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May 8, 2003

EPA Region 5 Records Ctr.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED



202437

Eileen L. Furey, Associate Regional Counsel (C-14J)
U.S. Environmental Protection Agency ("EPA"), Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3507

Re: Request For Information About the Kalamazoo River and PCBs

Dear Ms. Furey:

This responds to EPA's March 2003 CERCLA § 104(e) letters to Gould Paper Corporation, including a letter dated March 19, 2003 (the "Letter").

Background

Gould Paper Corporation ("Gould") owned and operated its wholly-owned subsidiary, the Hawthorne Paper Company ("Hawthorne"), from 1968 through 1974. Hawthorne solely was engaged in the operation of a single paper mill located along the Kalamazoo River in Michigan (the "Mill," the "Hawthorne Mill" or the "site"). Gould is a paper broker and does not and has not ever engaged or had an ownership interest in any paper manufacturing operations other than through Hawthorne at the Hawthorne Mill from 1968 through 1974.

The Hawthorne Mill produced uncoated, free-sheet white and colored paper. Hawthorne never purchased or used "NCR paper broke." Hawthorne never purchased or used "NCR paper converter trim." Hawthorne did not manage liquid or dry solid wastes on-site. Hawthorne discharged liquid waste exclusively to a publicly-owned treatment works ("POTW") operated by the City of Kalamazoo. Hawthorne's former President, Peter J. Gould, is not aware of the use of machine, transformer or other oils containing PCBs at the Hawthorne Mill. Accordingly, no wastes containing PCBs ever were generated or disposed of at the Hawthorne Mill.

Responses

The following numbered responses to EPA's specific requests are based, in part, on the attached proposed responses prepared by Peter J. Gould and sent to me via email on April 23, 2002. Peter J. Gould has reviewed this letter, but no longer is employed by or affiliated with Gould Paper Corporation. The following responses are limited to the activities of Hawthorne

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and also are limited in time to the 1968-1974 period unless otherwise indicated. The following responses also are based on my personal knowledge from representing Gould and from discussions with Patrick Mullen, Gould's Vice President, Secretary and Treasurer:

1. As discussed above, Peter J. Gould and Patrick Mullen were consulted in preparing the responses to these requests.

2. Historic mill furnish records and other documents related to historic Hawthorne Mill production activities were consulted in the preparation of responses to these requests. Such documents are voluminous and contain information considered proprietary and confidential in accordance with 40 C.F.R. § 2.203(b). Upon receipt and analysis of the information contained in this letter, should EPA still require that documents be provided, Gould will make a formal written request to Peter J. Gould - who is in possession of the documents, but who no longer has any affiliation with Gould - to provide the documents. Gould will then work with EPA and Peter J. Gould to undertake reasonable steps to provide any necessary documents.

3. As former President of Hawthorne, Peter J. Gould can provide the most detailed and complete response to any of EPA's current requests for information from Gould.

4. The only paper mill ever operated by Gould or its subsidiary, Hawthorne, was located along the Kalamazoo River in Michigan. Hawthorne manufactured uncoated white and colored paper at this location from 1968 until 1974. Access to the Hawthorne property was controlled by a surrounding fence and no waste was treated at, or discharged directly from, the Mill property. Hawthorne operated only two paper manufacturing machines at the Mill and sold approximately 70% of its manufactured paper output to the United States government.

5. The Michigan property on which the Hawthorne Mill was located as well as the existing manufacturing machinery were acquired by Gould from William and Louis Slavin in a 1968 asset purchase. The present whereabouts of the Slavins are unknown. Manufacturing operations ceased in 1974 and the manufacturing equipment was disassembled and then sold and shipped to Papeles and Cartones SA in San Pedro Sula, Honduras at that time. In 1975, Gould sold the entire Michigan property as an asset to Georgia Pacific Corporation. At the times of Hawthorne's purchase and subsequent operation of the Hawthorne Mill, the entire area within which the Hawthorne Mill operated was fenced. Access was limited to authorized employees or visitors. Peter J. Gould is not aware of any actual or threatened releases of hazardous substances at the Hawthorne Mill. To the extent any hazardous substances were managed on-site, there is no evidence of actual or threatened releases occurring during Hawthorne's ownership. As discussed above, liquid process wastes exclusively were discharged to the City of Kalamazoo POTW. Dry solid wastes were shipped off-site for proper disposal.

6. The Slavins are the only known operators of the Mill prior to Hawthorne. Hawthorne dismantled all paper manufacturing operations in conjunction with its sale of the

Michigan property. Peter J. Gould believes that the Slavins operated in the same manner as Hawthorne and, therefore, the information on site access and waste management presented above in response to Request Number 5 also applies to the Slavins' operations. To the extent any hazardous substances were managed on-site by the Slavins, there is no evidence of actual or threatened releases of hazardous substances occurring at the site prior to Hawthorne's ownership.

7. The Hawthorne Mill generated the following liquid waste streams: clay and titanium dioxide (the mineral rutile); softwood and hardwood fibers; and paper-coloring dyes and related chemicals. Dry solid wastes consisted of lunch or typical household garbage, office waste and unprocessed paper-like materials. Liquid wastes were discharged to, and treated by, the local POTW. Given the relatively low flow volumes involved (see response to Request Number 19), no pretreatment or other specific requirements were imposed by the City of Kalamazoo with respect to Hawthorne's wastewater. Dry wastes were either reused by waste paper product brokers or managed by off-site municipal waste handling contractors.

- a. To the extent records regarding TSS in wastewater exist approximately 30 years after the fact, they would be in the possession of the City of Kalamazoo. Hawthorne has no such records;
- b. There were no waste disposal areas on site. Land-based, off-site disposal locations did not accept or receive substances considered hazardous from Hawthorne;
- c. To the extent TSS loading limits existed, there were no exceedances of them;
- d. There were no dewatering or other lagoons or surface impoundments used to process Hawthorne wastewater;
- e. There were no storm sewer leaks or discharges on site or into the sanitary sewer;
- f. There were no sewerline leaks or discharges; and
- g. There were no leaks or discharges from transformers and no known significant leaks or discharges from machines or other equipment.

8. There is no evidence or recollection of releases of hazardous or other substances at or from the Hawthorne Mill. Accordingly, there are no identifiable data, estimates, analyses or other information regarding any releases.

9. The fiber furnish used at the Hawthorne Mill during its 1968-1974 period of operations consisted of: both Northern and Southern Bleached Kraft Pulp; bleached hardwood pulps; bleached envelope clippings; clay and titanium dioxide; dyes and assorted related materials, including: flocculants, Melamine, surfactants, retaining catalysis, corn starch, casins, diatomaceous earth and water.

No printed waste or undefined waste was used at any time for any of the furnishes manufactured by Hawthorne.

10. The Hawthorne Mill produced the following tonnage of uncoated, free-sheet, white and colored paper each year:

<u>Year</u>	<u>Tons</u>
1969	20,000
1970	21,200
1971	21,300
1972	23,600
1973	16,400
1974	6,000

11. The typical or estimated shrinkage for each Hawthorne paper product was 3 to 4%.

12. The Hawthorne Mill operated 250 days per year.

13. None -- the Hawthorne Mill did not use, purchase or otherwise obtain "NCR paper broke."

14. None - the Hawthorne Mill did not use, purchase or otherwise obtain "NCR paper converter trim."

15. No post-consumer waste paper was purchased or otherwise obtained directly from or through any waste paper broker listed in Attachment 3 to the Letter. Hawthorne did, however, purchase virgin Kraft pulp -- no waste paper grades -- from Mead Pulp Sales.

16. No records exist regarding Hawthorne's purchase of secondary fiber. See also responses to Request Numbers 9 and 13-15. Use of waste paper by Hawthorne was nominal, never exceeding 5%, in part, because Hawthorne's biggest customer, the United States government, had paper-quality specifications precluding the use of more than a nominal amount of waste paper in the paper products it purchased.

17. During the period including 1969-1970, the original save-alls installed on Hawthorne's two paper machines were replaced by new "Bird" save-alls.

18. Bird save-alls are based on a rotary screen technology with an estimated fiber-recovery efficiency of 95%.

19. Approximately 20-25 thousand gallons per day of wastewater were generated by Hawthorne from 1968-1973 as a result of the operation of the two paper machines. The volume of wastewater generated dropped off substantially as production declined in 1974. All wastewater was discharged to the local POTW. To the extent any records exist regarding the nature and volume of wastewater from the Hawthorne Mill during this time period, such records would be in the possession of the City of Kalamazoo. Hawthorne has no such records. See also response to Request Number 7.

20. Hawthorne did not engage in on-site wastewater treatment.

21. Hawthorne did not generate any wastewater treatment sludge. Any fiber and clay that was not recovered for incorporation into paper products would have been discharged in wastewater to the local POTW.

22. Not applicable. See response to Request Number 21.

23. Not applicable. See responses to Request Numbers 19-21.

24. Hawthorne never used fiber furnishes containing PCBs and, therefore, PCBs were not present in Hawthorne's products, wastewaters or emissions and no reports, data or other records of PCBs in the above furnishes, paper products, wastewaters or emissions exist. Similarly, Hawthorne did not use any machine, transformer or other oils containing PCBs.

25. No documents responsive to Request Number 25 have been identified. See response to Request Number 24. PCBs were not really an issue in or prior to 1975.

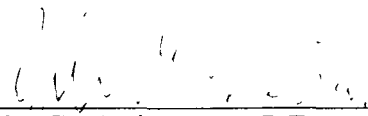
Gould believes the above responses fully comply with the letter and intent of CERCLA §104(e). We recognize that Gould's obligations to respond to EPA's Letter are continuing in nature. Should EPA require additional information from Gould, please contact us. In the meantime, if we do not hear from you, we will consider the matter closed unless new and additional responsive information becomes available to us.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Eileen L. Furey, Esq.
May 8, 2003
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Based upon my inquiry of Peter J. Gould, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. Peter J. Gould and I are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Executed on May 8, 2003



John G. Nevius, Esq., P.E.
Counsel to Gould Paper Corporation

Encl. (1)
cc: Patrick Mullen
Peter J. Gould

Nevius, John G.

From: CopackIntl@cs.com
Sent: Wednesday, April 23, 2003 11:41 AM
To: jnevius@andersonkill.com
Subject: Answers to Information Request for Gould Paper

Dear John:

Attached are my answers to the Information Request re. Hawthorne Paper.

Peter J. Gould

5/8/03

PETER J. GOULD

585 Industrial Road
Carlstadt, NJ 07072-1611
201-935-1110 F-201-935-5695
Email: getpg@cs.com

April 23, 2003

John G. Nevius, Esq.
Anderson Kill & Olick, P.C.
1251 Avenue of the Americas
New York, NY 10020

Dear John:

Following are my answers to the Information Requests:

1. Peter J. Gould
2. Mill furnish records and other production documents. Those furnish documents are proprietary.
3. None
4. Hawthorne Paper Company, a 2-machine, uncoated paper manufacturer providing 70 or more percent of its output to the Government Printing Office or Department of Defense or other government agencies. The balance was sold in commercial lines of distribution or direct.
5. Hawthorne Paper Company, a wholly owned subsidiary of Gould Paper Corporation. Prior to that acquisition by Gould the property was owned by William and Louis Slavin, present address unknown. Gould acquired the property in 1968, operated it until 1974. The property on which the mill resided was sold to Georgia Pacific Corporation in 1975. All of the equipment was disassembled and shipped to Papeles and Cartones SA in San Pedro Sula, Honduras. The property was completely fenced providing no access to any other than controlled persons. No hazardous substances were released during the period of ownership. The purchase by Gould was an asset, not a stock transaction.
6. Only known operators other than Gould were the previous owners, Bill and Louis Slavin. Prior to Slavin's ownership we have no knowledge of previous owners or operators. All other answers are the same as 5.

7. There are no actual or potential sources of release of hazardous substances, pollutants or contaminants from the Hawthorne Paper Mill facility with the exception of:
 - a) Miscellaneous waste water containing titanium dioxide, clay, softwood and hardwood fibers and dyes used in coloring. Records of those waste water discharges were kept by the city of Kalamazoo that processed all wastewater as well as sanitary water from the facility.
 - b) There were no waste disposal areas on site. All waste was given to solid-state waste contractors for household and office waste and to waste dealers for corrugated and/or broke not used in reprocessing.
 - c) There were no exceedances of the TSS loading limits.
 - d) There were no dewatering lagoons.
 - e) There were no storm sewer leaks or discharges onto the property or into the sanitary sewer.
 - f) There were no sewer line leaks or discharges.
 - g) There were no machine, transformer or other equipment leaks or discharges.
8. Not applicable because there were no releases.
9. The furnishes used were Northern Bleached Kraft Pulp, Southern Bleached Kraft Pulp, Bleached Hardwood Pulps, Bleached Envelope Clippings, Clay, TiO_2 , Flocculants, Dyes, Melamine, Surfactants, Retaining Catalysts, Water, Corn Starch, Casins, Diatomaceous Earth . No printed waste or undefined waste was used at any time for any of the furnishes manufactured by Hawthorne.
10. Uncoated free sheet white or colors as follows

1969 -	20,000 tons
1970 -	21,200 tons
1971 -	21,300 tons
1972 -	23,600 tons
1973 -	16,400 tons
1974 -	6,000 tons
11. Estimated at 3 to 4%.
12. 250
13. None between 1968 – 1974
14. None between 1968 – 1974
15. In reviewing Attachment 3 we did not buy any post-consumer waste paper from any of the sources on Attachment 3. We did, however, deal with Mead Pulp Sales but only purchased virgin Kraft pulp from that source, no waste paper grades.

16. No records available.
17. 1969 and 1970 upgrade to Bird Save-alls.
18. Bird Save-alls rotary screen type 95% efficient.
19. 1968 – 1974 approximately 20 – 25 million gallons. Records are or should be available from the City of Kalamazoo.
20. None
21. None
22. None
23. N/A
24. First 5 items – not applicable
6th item – No PCB oils used.
25. None available.

Sincerely,

Peter J. Gould
President

PJG:mvk